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November 20, 2014

Honorable Andrew L. Carter, Jr., U.S.D.J.
United States District Court
United States Courthouse
Southern District of New York
40 Foley Square
New York, New York 10007

RE: *United States v. Paul Ceglia*
Case No.: 12 cr 876 (ALC)

Dear Judge Carter:

The undersigned respectfully requests that Your Honor enter an Order reflecting the Court's decisions relative to Defendant's Request for a Bill of Particulars made during the July 22, 2014 conference date.

Seeking joint approval of the parties prior to submission, the undersigned forwarded the proposed order to the government with notice of defendant's intent to file the same with the Court. Although taken straight from the pleadings and the July 22, 2014 transcript, the government did not offer consent to defendant's submission citing disagreement with the "characterizations" presented and, believing that such "an order is not necessary, as that the transcript stands for itself."

It is the undersigned's firm belief that an Order regarding the Bill of Particulars is necessary to ensure factual specificity and certainty of issues, to avoid confusion and misinterpretations, and to prevent subsequent vacillation and equivocation.

For the convenience of the Court, the undersigned has prepared a "proposed order" for the Court's endorsement, which is enclosed herewith.

Thank you for Your Honor's consideration.

Respectfully submitted,

/s/ Robert Ross Fogg

Robert Ross Fogg, Esq.

Attorney for Defendant, Paul Ceglia

RRF/hs

Enc

cc: Janis Echenberg, AUSA
Paul Ceglia